

STATE OF FLORIDA  
DEPARTMENT OF FINANCIAL SERVICES  
DIVISION OF PUBLIC ASSISTANCE FRAUD

COUNTY OF  
Palm Beach

DFS NUMBER:  
PB-90-46069

AFFIDAVIT OF COMPLAINT

DCF CASE NUMBER(S):  
1195685068FS01

NAME(S): **Erica L. Navarrete aka** Erica Nieto

SOCIAL SECURITY NO.: [REDACTED] DOB 06/27/85

RACE: WHITE SEX: F HEIGHT: 5' 6" WEIGHT: 190 HAIR: BROWN EYES: BROWN

LAST KNOWN ADDRESS: 1348 NW Avenue P, Belle Glade, Florida 33430

OTHER COMMENTS Florida Driver License #N300-121-85-727-1.

Before me, personally appeared **Sara H. Stewart**, Investigator, Department of Financial Services of the State of Florida, Division of Public Assistance Fraud, who first being duly sworn, deposes and says that she has reason to believe that **Erica L. Navarrete**, on various days between the **16<sup>th</sup> day of July 2014** and the **30<sup>th</sup> day of June 2015**, in **Palm Beach County**, State of Florida, did knowingly, by means of a false statement, misrepresentation, impersonation, or other fraudulent means fail to disclose a material fact used in making a determination as to his/her qualification to receive aid or benefits under a state or federally funded assistance program; or did knowingly fail to disclose change in circumstances in order to obtain or continue to receive aid or benefits under such a program in an amount larger than that to which he/she was entitled; or did knowingly aid and abet another person in the commission of any such act, contrary to the provisions of Section 414.39(1), Florida Statutes; specifically:

On or about July 16, 2014, December 17, 2014 and June 8, 2015, Erica Navarrete applied to the Department of Children and Families (Department) to receive Public Assistance. During her July 16, 2014 review of eligibility, she reported that her employment with Wells Fargo Bank ended on July 14, 2014 and that she received her final pay check on August 1, 2014. During her December 17, 2014 review of eligibility she reports that there was no earned income available to her household from employment. Additionally, during the aforementioned review processes, Erica Navarrete acknowledged her responsibility to provide the Department with true and complete information, as well as to report any changes in her income situation. (Witnesses 1 and 3; Enclosures A through C-3)

**INVESTIGATION REVEALED:**

- Erica Navarrete failed to report that she was gainfully employed by Wells Fargo Bank, NA. On her July 16, 2014 application, Ms. Navarrete reported to the Department, that her employment ended with Wells Fargo Bank NA, when in fact; she was still employed with the company. Ms. Navarrete, received her first pertinent pay check on August 1, 2014 and was continuously employed through at least June 30, 2015. Payroll records reflect that during the period of July 2014 through at least June 2015, she earned total gross wages of \$22,477.78 from this employment, a material fact she failed to report to the Department. (Witnesses 4 through 6; Enclosures D, E and F)

FILED

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SHARON P. BUCK, CLERK  
PALM BEACH COUNTY  
CIRCUIT CLERK

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Erica Navarrete, by means of false statements and/or omissions, failed to report that she was employed by Wells Fargo Bank, NA, during her July 16, 2014 and December 17, 2014, reviews of eligibility. As a result, she received \$5,382.00 in Food Assistance Benefits, during the period of August 2014 through June 2015, to which she was not legally entitled (Witnesses 1, 2; Enclosure G)

A list of witnesses who can identify the subject and present testimony and documents in support of this complaint is attached.

*Sara H. Stewart*  
Signature Affiant/Complainant

State of Florida

County of Palm Beach

Sworn to and subscribed before me

this 13 day of, February A.D. 2016 by

Sara H. Stewart

(name of person(s) acknowledged)

who is/are personally known to me and did take an oath.

Signature *Pamela L. Altieri* Type or Print Name Pamela L. Altieri

Title Notary Public /

My Commission Expires:

